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July 8, 2025

VIA ECF

Honorable Mary Kay Vyskocil, U.S.D.J.
United States District Court Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

Re: *The Hearst Corporation v. Ace American Insurance Company*
1:24-cv-06890-MKV
LF File 430.0567498

Dear Judge Vyskocil:

We represent Defendant ACE American Insurance Company (“AAIC” or “Defendant”) in the captioned matter. In accordance with Rule 9 of Your Individual Rules of Practice in Civil Cases, Defendant respectfully requests approval of redactions in a publicly filed document (ECF Doc. 53).

The redactions at paragraphs 26, 35 and 36 of the document pertain to deposition testimony that Plaintiff designated as confidential pursuant to the Stipulated Confidentiality Agreement and Protective Order (ECF Doc. 33). The redaction at paragraph 18 pertains to a mediation statement filed in underlying litigation. A copy of the unredacted document with the proposed redactions highlighted has been electronically filed on ECF and related to this letter motion.

A copy of this letter with (i) a clean (i.e., unredacted) copy of the document and (ii) a copy of the document highlighting the information that has been redacted in the ECF filing will be emailed to Chambers at the time of the electronic filing.

London Fischer LLP

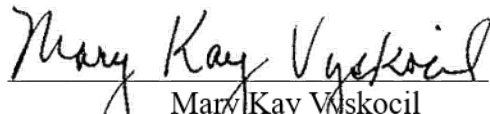
/s/ Daniel W. London

Daniel London

Defendant's request is granted provisionally pending the resolution of its summary judgment motion.

SO ORDERED.

Date: July 9, 2025
New York, New York


Mary Kay Vyskocil
United States District Judge